



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 3, 2024

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By Email and ECF

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

Please find the following materials produced in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which are contained on encrypted hard drives produced separately to counsel for the respective defendant. The government renews its request for reciprocal discovery from the defendants.

Bates No.	Description of Item
EDNY-037881	Forensic image of the unencrypted portion of a Silver Apple iMac All in One Desktop, model A1419, serial number [REDACTED], that was Seized at the Sun and Hu Residence. [REDACTED]

Bates No.	Description of Item
EDNY-037882	Forensic Image of a Silver MacBook Pro with Serial Number [REDACTED] that was Seized at the Sun and Hu Residence
EDNY-037883	Forensic Image of a Gold-colored USB that was Seized at the Sun and Hu Residence
EDNY-037884	Forensic Image of a blue and white USB that was Seized at the Sun and Hu Residence
EDNY-037885	Forensic Image of a SIM Card that was Seized at the Sun and Hu Residence
EDNY-037886	Forensic Image of a white USB that was Seized at the Sun and Hu Residence
EDNY-037887	Forensic Image of an iPhone XM model A1984, IMEI [REDACTED], that was Seized at the Sun and Hu Residence
EDNY-037888	Forensic Image of an iPhone 12 Pro, Model A2341, IMEI [REDACTED], that was Seized at the Sun and Hu Residence
EDNY-037889	Forensic Image of two micro SD cards that were Seized at the Sun and Hu Residence
EDNY-037890	Forensic Image of a red and black SanDisk USB that was Seized at the Sun and Hu Residence
EDNY-037891	Forensic Image of a 16 GB silver Lexar USB that was Seized at the Sun and Hu Residence
EDNY-037892	Forensic Image of a USB that was Seized at the Sun and Hu Residence
EDNY-037893	Forensic Image of an iPhone X, model 1921, IMEI [REDACTED], that was Seized at the Sun and Hu Residence
EDNY-037894	Responsive Report for an Electronic Device Owned by [REDACTED]

Bates No.	Description of Item
EDNY-037895	Responsive Report for an Electronic Device Owned by [REDACTED]

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
Alexander A. Solomon
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cc: Clerk of the Court (BMC) (by ECF) (without download link)